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August 19, 2020

Nathan Otis
Nicholson, Gansner & Otis, S.C.
22 East Mifflin Street
Suite 90
Madison, WI 53703

Re: *United States v. Austin Hedges*
Case No.: 19-cr-00155-jdp

Dear Mr. Otis:

Pursuant to your request and the Court's order, the purpose of this letter is to provide supplemental notice pursuant to Rule 16(a)(1)(G) of the government's intent to use expert testimony during its case-in-chief at trial.

The government intends to call ATF Special Agent Anthony Rotuno as an expert in this case. He will testify that the guns seized in this case were manufactured outside the state of Wisconsin, and thus traveled in and affected Interstate Commerce. Additionally, he will testify that each of the guns constitutes a firearm under 18 U.S.C. § 921(a)(3).

These opinions are based on Rotuno's training and experience as described in his CV, a visual inspection of the firearm and ammunition, and consultation of data bases and reference manuals that other experts rely on.

Rotuno's report was previously provided to you in discovery. His CV is attached.

Very truly yours,

SCOTT C. BLADER
United States Attorney

By: /s/
ELIZABETH ALTMAN
Assistant United States Attorney